

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In Re:

	:	Case No. 23-21984 GLT
David L. Mattis & C. Michelle Mattis,	:	
	:	Chapter 13
Debtors,	:	
	:	Document No.

DEBTORS' REPORT TO SHOW CAUSE WHY  
THEIR CASE SHOULD NOT BE DISMISSED

AND NOW COMES, Debtor's Counsel, Daniel R. White, Esquire and Calaiaro Valencik, P.C., and files the following Report to show cause why Debtors' case should not be dismissed as required by this Court's July 3, 2025 Order:

1. Debtors filed their Joint Chapter 13 Bankruptcy on September 19, 2023 primarily to get their home mortgage back on track.
2. Debtors are a household of 3 consisting of themselves and an adult disabled daughter, who requires round the clock care and supervision provided by Debtors and an in home nurse who comes when the Debtors are working.
3. Debtors are in month 22 of a 60 month Chapter 13 Plan, confirmed December 9, 2024 and are delinquent with their monthly payments since their most recent plan was confirmed. The recent delinquency was due to an issue with the daughter's visiting nurse not showing up for scheduled time and not providing sufficient care throughout the late winter of 2024 and early spring 2025. This caused Debtor-Husband to miss substitute teaching opportunities and resulted in a temporary reduction of household income.
4. In addition, Debtors were required to spend nearly \$4,000.00 during the spring months to fix their vehicle's transmission and replace tires so that they could get to work.
5. Debtors have secured a new more reliable nurse to care for their daughter which will free the Debtors up to work more consistently. In addition, Debtor-Wife has taken on a part time job working at The Cozy Inn Pet Resort making an additional \$180.00-\$200.00 per week. This new employment was reflected on the Amended Schedule I filed July 15, 2025. Also reflected on the Amended Schedule I, was an increase in



Social Security income for both Debtors.

6. A recent change in the insurance coverage for Debtors' adult daughter which stopped paying for necessary but non-medical expenses such as, adult diapers and other personal items, resulted in an increase in household expenses and a decrease in daughter's contribution to the household. Debtors are working with the insurance company to cover these expenses and are exploring a change in insurance in September 2025.
7. Debtors made their June 2025 payment late by TFS in the first week of July. Debtors intend to schedule a full July payment before the end of July and before the Rule to Show Cause hearing. This will leave the Debtors approximately 2 ½ payments in arrears since November 2024. They will increase their monthly TFS payments by approximately \$150.00 per month to make up for the payment delinquency. Debtors have opened a dedicated bank account to use for the TFS payments to ensure the payments will be covered.
8. In summary, Debtors had temporary increases in their expenses and decrease in household income, which coupled with the unexpected car expenses caused them to get behind with their payments since November 2024. The increased household income and resolution of the home nurse and vehicle issues will allow Debtors to afford a higher monthly payment and make consistent monthly payments going forward.

WHEREFORE, Debtors respectfully request this Court to determine that Debtors' combination of increased household income and resolution of temporary expense increases, provides cause for a finding that the Debtors' plan payment is feasible and their case should not be dismissed.

Date: July 15, 2025

CALAIARO VALENCIK, P.C.

BY

/s/ Daniel R. White

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